217/782-2113

"RENEWAL"
TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

BWAY Packaging
Attn: Leon J. Parker
3400 North Powell Avenue
Franklin Park, Illinois 60131

I.D. No.: 031096AAE
Application No.: 95120005

Date Received: March 2, 2004
Date Issued: September 7, 2005
Expiration Date: September 6, 2010

Operation of: Tinplate Sheets Printing & Coating
Source Location: 3400 North Powell Avenue, Cook County, 60131
Responsible Official: Leon J. Parker, Engineering and Corporate Environmental

This permit is hereby granted to the above-designated Permittee to OPERATE a printing/coating plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

[1] Except as provided in Conditions 1.5 and 8.7 of this permit.

TABLE OF CONTENTS

1.0 SOURCE IDENTIFICATION

1.1 Source

BWAY Packaging
3400 North Powell Avenue
Chicago, Illinois 60131
847/288-3030

I.D. No.: 031096AAE
County: Cook
Standard Industrial Classification: 3479, Metal Decorating

1.2 Owner/Parent Company

BWAY Packaging
8607 Roberts Drive, Suite 250
Atlanta, Georgia 30350

1.3 Operator

BWAY Packaging
3400 North Powell Avenue
Chicago, Illinois 60131

Leon J. Parker
847/288-3030

1.4 Source Description

BWAY Packaging is located at 3400 North Powell Avenue in Franklin Park and consists of four tinplate sheet fed coater oven lines and two tinplate heatset sheet fed offset lithographic printing lines with overvarnish coaters. Four thermal oxidizers are employed to control VOM emissions from permanent total enclosures and ovens. The tinplate sheets are coated with an organic coating, printed and varnished as required and subsequently cut into rectangular blanks for use in making cans.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

b. This permit contains Title I conditions that revise Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1R."

c. This permit contains Title I conditions that are newly established in this CAAPP permit, which conditions are specifically designated as "T1N."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

b. Equipment used for the melting or application of less than 50,000 lb/yr of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC

Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.2.3 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 218.182.

3.2.4 For each open burning activity, the Permittee shall comply with 35 IAC Part 237, including the requirement to obtain a permit for open burning in accordance with 35 IAC 237.201, if necessary.

3.2.5 For each storage tank that has a storage capacity greater than 946 liters (250 gallons) and, if no odor nuisance exists, that stores an organic material with a vapor pressure exceeding 2.5 psia, the Permittee shall comply with the applicable requirements of 35 IAC 218.122, which requires use of a permanent submerged loading pipe, submerged fill, a vapor recovery system, or an equivalent device approved by the Illinois EPA. [Note: storage tanks used for storing gasoline and any hazardous air pollutants are not illegible for insignificant activities].

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 **SIGNIFICANT EMISSION UNITS AT THIS SOURCE**

Emission Unit	Description	Date of Construction	Emission Control Equipment
Unit 01 Heatset Sheet Fed Offset Lithographic Printing Lines	Lines PC-2, PC-5, PC-7, PC-8	PC-2: 1975 PC-5: 1995 PC-7: 2003 PC-8: 2004	Smith Thermal Oxidizer for Controlling Drying Ovens and VOM Emissions from Applied Inks Catpro Thermal Oxidizer None
Unit 02 Coating Application	Four Coating Lines and Three Coating/Varnish Applicators (Operated as a Part of Printing Lines)	CO-1: Prior to 1972 CO-3: 1997 CO-4: Prior to 1972 CO-6: 2003 CTO-4 (Part of PC-7): 2003 Two Coaters (Part of PC-2/PC-7): 1975; 1995	Permanent Total Enclosures with Four Thermal Oxidizers
Unit 03 Space Heater	One Natural Gas-Fired Space Heater with a Firing Rate 25.0 mmBtu/Hr	1987	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of Clean Air Act Permit Program (CAAPP)

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM emissions.

5.2 Area Designation

5.2.1 This source is located in an area that is non-attainment for ozone, $PM_{2.5}$ and PM_{10} and attainment for other pollutants of the National Ambient Air Quality Standards.

5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

5.3.3 Fugitive Particulate Matter Operating Program

a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with a fugitive particular matter operating program submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph (b) below.

b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.6 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such

regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

c. The affected source is subject to requirements of 40 CFR Part 63 Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans". For an existing affected source, the compliance date is established at November 13, 2006. By this date, the Permittee shall submit revisions to the Title V permit by addressing method(s) of compliance and how compliance with other applicable requirements established by Subpart KKKK is achieved.

5.3.7 Episode Action Plan

a. Pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

c. If an operational change occurs at the source which invalidates the plan, a revised plan shall be submitted to the Illinois EPA for review within 30 days of the change, pursuant to 35 IAC 244.143(d). Such plans shall be further revised if disapproved by the Illinois EPA.

d. A copy of the original plan and any subsequent revisions shall also be sent to the Chicago Department of Environmental Control.

5.4 Source-Wide Non-Applicability of Regulations of Concern

a. This source is not subject to 40 CFR Part 63, Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans", because the source is not a major source of HAP emissions. (See also Condition 5.6.2)

b. The affected source is not subject to 40 CFR 60 Subpart WW "A Standards of Performance for the Beverage Can Surface Coating Industry", because no beverage can coating performed at this location.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. There may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	51.73
Sulfur Dioxide (SO_2)	----
Particulate Matter (PM)	0.37
Nitrogen Oxides (NO_x)	4.57
HAP, not included in VOM or PM	----
Total	56.67

5.6.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). This condition is being imposed so that the source is not a major source of HAP emissions and the requirements of 40 CFR Part 63, Subpart KKKK do not apply to this source. The Permittee shall fulfill the applicable testing, recordkeeping, and reporting requirements of Conditions 5.7.2, 5.9.3, and 5.10.2.

5.6.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may

be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.7.2 HAP Testing to Verify Minor Source Status

Pursuant to Condition 5.7.1 and to verify compliance with the requirements of Condition 5.6.2, that is this source is not a major source of HAPs, the following testing requirements are established:

a. If in the previous calendar year, emissions of HAPs exceeded 80% of major source threshold for individual or total HAPs (greater than 8 tons of a single HAP or greater than 20 tons of total HAPs), then testing for HAPs using USEPA Method 311 shall be conducted as follows:

Test the top five coatings, solvents and/or other HAP-containing materials used by the source that make the largest contributions to individual and total HAP

emissions. The largest contributions are defined as the product of usage and HAP content. If two coatings differ only in pigment, then both do not have to be tested.

b. Testing may be conducted by the supplier of the HAP-containing material.

c. The calculation as to whether the 80% of major source threshold was exceeded shall be based on records and procedures in Condition 5.9.2 and shall be completed by January 31 for the previous calendar year. If testing is required it shall be completed by March 15.

d. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Records for Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for Source-Wide Control Requirements and Work Practices

The Permittee shall keep copy of the fugitive particulate matter operating plan, and any amendments to the plan, as required by Condition 5.3. The Permittee shall also keep a record of activities completed according to the plan.

5.9.3 Records for HAP Emissions

a. The Permittee shall maintain records of individual and combined HAP emissions on a monthly and annual basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.2, pursuant to Section 39.5(7)(b) of the Act.

b. If testing is required by Condition 5.7.2, the Permittee shall keep records of the testing, including the test date, conditions, methodologies, calculations, test results, and any discrepancies between the test results and formulation specifications of Condition 5.9.2(c) below.

c. The Permittee shall keep an MSDS or equivalent document showing the formulation of each coating, including content of all HAPs. These formulation sheets may be used to make the calculation of HAP emissions required by Condition 5.7.2. If the formulation sheet uses a maximum or range value (e.g., less than 1% or range of 2 – 3%) then the highest value shall be used.

5.9.4 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

b. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made [35 IAC 212.324(g)(6)].

5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 Source-Wide Compliance Procedures

5.12.1 Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1 Emissions Reduction Market System (ERMS)

6.1.2 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.1.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.

i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.1.4 Market Transactions

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.1.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and

ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.1.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not

yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 497 ATUs per seasonal allotment period.

ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 56.43 tons per season.

iii. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.

iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Four Color UV Press and Trail Coater Line (PC-7)	00120052	01/09/2001
Two Color UV Press (PC-8)	04050040	08/25/2004

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.1.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.1.10 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Space Heater (Group 3)

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Sheet Fed Offset Lithographic Printing Lines

7.1.1 Description

Up to seven colors are applied to the tinplate sheets on the offset lithographic printing presses.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Sheet Fed Offset Lithographic Printing Lines	Two Printing Lines (PC-2 and PC-5) Comprised of the Two Tandem Presses and Two Drying Ovens	Line PC-5 and Single Color Press with Oven from Line PC-2 - Prior to 1975; Single Color Hoe Press (Line PC-2): 1995	Smith Thermal Oxidizer for Controlling Drying Ovens and VOM Emissions from Applied Inks
	Printing Line PC-7 with a Drying Oven	2003	Catpro Thermal Oxidizer
	Printing Line PC-8 (Two Color UV Press)	2004	None

7.1.3 Applicable Provisions and Regulations

a. An "affected printing line" for the purpose of these unit specific conditions, is a heatset sheet fed offset printing line which includes a tandem individual printing press and drying oven.

b. Each affected printing line at the source is subject to limitations and requirements of 35 IAC 218.407(a)(3)(A), 218.407(a)(4)(B), and 218.407(a)(5) for as-applied fountain and cleaning solution. These requirements and limitations are described further in Conditions 7.1.5 and 7.1.6.

c. The affected printing line is subject to 35 IAC 212.321(b)(1), which provides that:

> No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of

particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

d. The affected printing lines PC-2, PC-5, PC-7, and associated thermal oxidizers are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. CAM requirements are discussed further in Condition 7.1.8 and Attachment 3.

7.1.4 Non-Applicability of Regulations of Concern

a. The affected printing line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected printing line is not by definition a fuel combustion emission unit.

b. The affected printing line is not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected printing line is not by definition a fuel combustion emission unit.

c. The affected printing line is not subject to control requirements and emission limitations of 35 IAC 218.407(a)(1)(B), (C), (D), and (E), because affected printing line is not a heatset web offset lithographic printing line.

d. This permit is issued based on the affected printing line PC 8 not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because this line does not use an air pollution control device for controlling regulated air pollutants.

7.1.5 Control Requirements and Work Practices

a. Each affected printing line at the source is subject to requirements of 35 IAC 218.407(a)(5) for keeping cleaning materials, which provides that:

The VOM containing cleaning materials, including used cleaning towels associated with any lithographic printing line shall be kept, stored and disposed of in closed containers.

b. Each affected curing oven and thermal oxidizer shall only be operated with natural gas as the fuel.

c. Smith thermal oxidizer (Lines PC-2/PC-5) can be seasonally shut down as allowed by 35 IAC 218.107.

d. The thermal oxidizer controlling emissions from PC-7 shall be in operation at all times when the conventional ink station is in operation and emitting air contaminants.

e. The afterburner combustion chamber of the thermal oxidizer shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before the printing operation is begun, and this temperature shall be maintained during operation of the affected printing line.

f. The Permittee shall follow good operating practices for the thermal oxidizers, including periodic inspection, routine maintenance and repair of defects.

7.1.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected printing lines are subject to the following:

a. Each affected printing line at the source is subject to limitations of 35 IAC 218.407(a)(3)(A) for as-applied fountain solution, which provides that:

> No owner or operator of any sheet-fed offset lithographic printing line shall apply fountain solution with the VOM content exceeding 5.0 percent, by volume.

b. Each affected printing line at the source is subject to limitations of 35 IAC 218.407(a)(4)(B) for as-used cleaning solution, which provides that:

> No owner or operator of any lithographic printing line shall apply the as-used cleaning solution with a composite vapor pressure exceeding 10 mmHg at 20°C (68°F).

c. Emissions and operation of a tandem two color Hoe press (Printing Line PC-2, shall not exceed the following limits:

i. OPERATION:

Material	Material Usage (lb/mo)	(lb/yr)	VOM Content (wt. %)
Inks	845	10,140	6.46
Fountain Solvent	1,847	22,164	4.14
Clean-Up Solvent	1,258	15,096	100

ii. EMISSIONS:

Operating Period	VOM Emissions (lb/mo)	(T/Operating Period)
April - October	1,349	4.91
November - March	1,390	3.47
	Annual Total:	8.38

These limits are based on the maximum operating rate and 75% of the overall reduction of VOM emissions from applied inks by the thermal oxidizer from April thru October. The oxidizer is considered shut down from November thru March.

The above limitations had been carried from initial CAAPP permit and contain revisions to previously issued Construction Permit 95110123, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, material usage limits and VOM emissions have been increased [T1].

d. Emissions and operation of a tandem two color Hoe press, printing line PC-5, shall not exceed the following limits:

i. OPERATION:

Material	Material Usage (lb/mo)	(lb/yr)	Average VOM Content (wt.%)
Inks	1,477	17,724	6.46
Fountain Solvents	2,054	24,643	4.13
Clean-Up Solvent	1,266	15,192	100

ii. EMISSIONS:

Operating Period	VOM Emissions (lb/mo)	(T/Operating Period)
April - October	1,375	4.81
November - March	1,446	3.61
	Annual Total:	8.42

These limits are based on the maximum operating rate and 75% of the overall reduction of VOM emissions from applied inks by the thermal oxidizer from April thru October. The oxidizer is considered shut down from November thru March.

The above limitations had been established in initial CAAPP permit, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned construction permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. [T1].

e. i. The thermal oxidizer controlling emissions from Line PC-7 shall be operated to achieve at least 100 percent capture and 97.5 percent overall control efficiency for VOM.

ii. Total VOM emissions from the affected printing Line PC-7 (along with emissions from the coating operations performed by the associated coater and described in Section 7.2 of this permit) shall not exceed the following limits:

VOM Emissions	
(Ton/mo)	(Ton/yr)
0.9	8.25

These limits are based on the maximum operating rate and an oxidizer overall control efficiency as described above.

iii. The above limitations were established in Permit 00120052, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

f. i. Total usage of clean-up solvents in the affected printing Line PC-8 shall not exceed 0.7 tons/month and 0.78 tons/year.

ii. Emissions from the affected printing Line PC-8 (other than from application of UV printing and coating materials shall not exceed the following limits:

VOM Emissions	
(Ton/mo)	(Ton/yr)
0.7	0.78

iii. VOM emissions from the application of UV printing and coating on the affected printing Line PC-8 shall not exceed negligible limits of 0.1 lb/hr and 0.44 ton/year.

iv. The above limitations were established in Permit 04050040, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

g. Compliance with annual limits for all affected printing lines mentioned in Condition 7.1.6 above shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

7.1.7 Testing Requirements

a. Upon request of the Illinois EPA or USEPA, testing to demonstrate compliance with the VOM content limitations for fountain/cleaning solution and fountain solution additives, cleaning solvents, and inks, shall be conducted, as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

i. The applicable test methods and procedures specified in 35 IAC 218.105(a) shall be used, provided, however, Method 24 shall be used to demonstrate compliance; or

ii. The manufacturer’s specifications for VOM content for fountain solution additives, cleaning solvents, varnish coatings and inks may be used if such manufacturer's specifications are based on results of tests of the VOM content conducted in accordance with methods specified in 35 IAC 218.105(a), provided, however, Method 24 shall be used to determine compliance.

b. Upon request of the Illinois EPA or USEPA, testing to demonstrate compliance with 35 IAC 218.407(a)(4)(B) of the VOM composite partial vapor pressure of the as-used

cleaning solution shall be conducted, as follows [35 IAC 218.110 and Section 39.5(7)(b) of the Act]:

Testing for VOM content of coatings and other materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

i. If the organic material or solvent consists of only a single compound, the vapor pressure shall be determined by ASTM Method D2879-86 (incorporated by reference in Section 218.112 of this Part) or the vapor pressure may be obtained from a publication such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973); Perry's Chemical Engineer's Handbook, McGraw-Hill Book Company (1984); CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-87); and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985);

ii. If the organic material or solvent is in a mixture made up of both organic material compounds and compounds which are not organic material, the vapor pressure shall be determined by the following equation:

$$P_{VOM} = \frac{\sum_{i=1}^{n} P_i X_i}{\sum_{i=1}^{n} X_i}$$

Where:

P_{vom} = Total vapor pressure of the portion of the mixture which is composed of organic material

n = Number of organic material components in the mixture

i = Subscript denoting an individual component

P_i = Vapor pressure of an organic material component determined in accordance with Condition 7.2.7(a)

X_i = Mole fraction of the organic material component of the total mixture

iii. If the organic material or solvent is in a mixture made up of only organic material compounds, the vapor pressure shall be determined by ASTM Method D2879-86 or by the above equation.

c. The percent concentration of solvent in the VOM containing waste shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260, or by using USEPA Method 24 of 40 CFR 60, Appendix A.

d. Testing requirements for oxidizers are described further in Condition 7.2.7 of this permit.

7.1.8 Monitoring Requirements

a. Fountain Solution

Fountain Solution VOM Content

i. For a fountain solution to which VOM is not added automatically:

A. Maintain records of the VOM content of the fountain solution; or

B. Take a sample of the as-applied fountain solution from the fountain tray or reservoir, as applicable, each time a fresh batch of fountain solution is prepared or each time VOM is added to an existing batch of fountain solution in the fountain tray or reservoir, and shall determine compliance with the VOM content limitation of the as-applied fountain solution by using one of the following options:

1. With a refractometer or hydrometer with a visual, analog, or digital readout and with an accuracy of 0.5 percent. The refractometer or hydrometer must be calibrated with a standard solution for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications, against measurements performed to determine compliance. The refractometer or hydrometer must be corrected for temperature at least once per 8-hour shift or once per batch of fountain solution prepared or modified, whichever is longer; or

2. With a conductivity meter if it is demonstrated that a refractometer and

hydrometer cannot distinguish between compliant and noncompliant fountain solution for the type and amount of VOM in the fountain solution. A source may use a conductivity meter if it demonstrates that both hydrometers and refractometers fail to provide significantly different measurements for standard solutions containing 95 percent, 100 percent and 105 percent of the applicable VOM content limit. The conductivity meter reading for the fountain solution must be referenced to the conductivity of the incoming water. A standard solution shall be used to calibrate the conductivity meter for the type of VOM used in the fountain solution, in accordance with manufacturer's specifications.

ii. For fountain solutions to which VOM is added at the source with automatic feed equipment, determine the VOM content of the as-applied fountain solution based on the setting of the automatic feed equipment which makes additions of VOM up to a pre-set level. The equipment used to make automatic additions must be installed, calibrated, operated and maintained in accordance with manufacturer's specifications.

b. Cleaning Solution

The owner or operator of any lithographic printing line relying on the vapor pressure of the cleaning solution to comply with 35 IAC 218.407(a)(4)(B) must keep records for such cleaning solutions used on each affected printing line.

c. Thermal Oxidizer

Pursuant to 35 IAC 218.105(d)(2)(A)(i), each thermal oxidizer shall be equipped with a USEPA approved continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. This monitoring equipment shall monitor the combustion chamber temperature of an afterburner.

d. Compliance Assurance Monitoring (CAM) Requirements

The affected Printing Lines PC-2, PC-5, and PC-7 are subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3,

pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected printing line to demonstrate compliance with Condition 5.6.1, 7.1.3 and 7.1.6 pursuant to Section 39.5(7)(b) of the Act:

a. The Permittee shall collect and record all of the following information each day for each affected printing line and maintain the information at the source for a period of three years:

i. Control device monitoring data;

ii. A log of operating time for the capture system, afterburner, monitoring equipment and the associated coating line; and

iii. A maintenance log for the capture system, thermal oxidizer and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

b. Fountain Solution

i. The Permittee shall collect and record the name and identification of each batch of fountain solution prepared for use on one or more lithographic printing lines or centralized reservoir using such batch of fountain solution, and the applicable VOM content limitation for the batch [35 IAC 218.411(c)(2)(A)].

ii. For each batch of as-applied fountain solution, the following information shall be collected and recorded, pursuant to 35 IAC 218.411(c)(2)(C):

A. Date and time of preparation and each subsequent modification of the batch;

B. Volume and VOM content of each component used in, or subsequently added to, the fountain solution batch;

C. Calculated VOM content in terms of volume percent of the as-applied fountain solution; and

D. Any other information necessary to demonstrate compliance with the applicable VOM content limits.

c. Cleaning Solution

For each batch of cleaning solution for which the owner or operator relies on the vapor pressure of the cleaning solution to demonstrate compliance with Condition 7.1.6(b):

i. The name and identification of each cleaning solution;

ii. Date and time of preparation, and each subsequent modification, of the batch;

iii. The molecular weight, density, and VOM composite vapor pressure of each cleaning solvent;

iv. The total amount of each cleaning solvent used to prepare the as-used cleaning solution; and

v. The VOM composite partial vapor pressure of each as-used cleaning solution.

d. The Permittee shall record the date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any [35 IAC 218.411(d)(2)(D)].

e. The Permittee shall collect and record the following information for the lithographic presses for demonstration compliance with Conditions 5.6 and 7.1.6:

i. The name and identification number of each ink, fountain solution and cleaning solution, as applied on all lithographic printing lines.

ii. Total usage of each ink, fountain solution and cleaning solution, in terms of pounds per month and tons per year, on the monthly and annual basis.

iii. Total usage of each ink, fountain solution and cleaning solution as applied on the tandem Hoe presses (printing lines PC-2 and PC-5), lines PC-7 and PC-8 in terms of pounds per month and tons per year, on the monthly and annual basis.

iv. The VOM content of each ink (or an average VOM content of group of inks, as applied), fountain solution and cleaning solution applied on affected printing lines PC-2, PC-5, PC-7, and PC-8 in terms of % VOM by weight and accompanied by a copy of supporting information, e.g., supplier data sheet or laboratory analysis report.

v. The Permittee shall maintain an operating log that states which method of compliance is being used for the cleaning and fountain solutions and the dates each method is used.

vi. Natural gas usage for thermal oxidizer and ovens, in the terms of scf/year or therms/year.

vii. Total VOM emissions in tons/month and tons/year from affected printing lines PC-2, PC-5, PC-7, PC-8 calculated based on the recordkeeping requirements of Condition 7.1.9 and compliance procedures from Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected printing line with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

a. Report of Deviations

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

b. Report for Changing Method of Compliance

If the Permittee changes the method of demonstrating compliance with the applicable VOM content limitations of 35 IAC 218.407 or changes the method of demonstrating compliance with the VOM content limitations for fountain solutions, the Permittee shall certify compliance for such new methods in accordance with the requirements of the certification reports of Condition 9.8 within 30 days after making such change, and perform all tests and calculations necessary to demonstrate that such printing line(s) will be in compliance with the applicable requirements of 35 IAC 218.407 and the requirements of this permit [35 IAC 218.411(c)(4) and (d)(4).

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected printing line without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee=s obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of inks, fountain solution and cleaning solution at this source with various VOM contents provided that the materials are tested in accordance with the conditions of this section and the emission limitations in Conditions 5.6 and 7.1.6 are not exceeded and the affected printing line remains in compliance.

7.1.12 Compliance Procedures

a. Compliance of the affected printing line with VOM emission limitations in Condition 7.1.6(a) and (b) shall be based on the recordkeeping requirements of Condition 7.1.9.

b. Compliance with Annual VOM emission limits in Conditions 5.6 and 7.1.6(c), (d), (e), and (f) shall be based on the recordkeeping requirements in Condition 7.1.9 and by use of the formulas listed below:

Ink VOM Emissions = VOM Contained in Ink x [(Capture Efficiency (100 - Capture Efficiency)/100 x Destruction Efficiency (100 - Destruction Efficiency)/100]

Fountain Solution VOM Emissions = Volume of Each Batch Applied x VOM Content (wt. %)];

Cleaning Solution VOM Emissions = Volume of Each Batch Applied x VOM content

Total VOM Emissions = Ink VOM Emissions + Fountain Solution VOM Emissions + Cleaning Solution VOM Emissions

c. Emissions of NO_x, PM and VOM from ovens and oxidizer burning natural gas shall be calculated based on the standard emission factors for natural gas combustion from AP-42:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March, 1998.

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

7.2 Coating Application

7.2.1 Description

Tinplate sheets are coated on one side and then transferred to the litho printing lines for printing the label identification. Then on overvarnish is applied to printed surfaces.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Coating Application	Coating Lines PC-2 and I 5 (One Overvarnish Applicator on Each Line the Enclosure and One Drying Oven)	Prior to 1975	Smith Thermal Oxidizer
	Coater Line CO-1 with Rc Coater in the Permanent Total Enclosure (PTE) ar Drying Oven	Prior to 1972	Smith Thermal Oxidizer
	Coater Line CO-3 with Rc Coater in the Permanent Total Enclosure (PTE) ar Drying Oven, Controlled Individual Build-in Thermal Oxidizer	1997	Catpro Thermal Oxidizer
	Coater Lines CO-4 and CO-6 with Roll Coater on Each Line in the Permanent Total Enclosure (PTE) and Drying Oven, all Controlled by a Single Thermal Oxidizer	CO-4: Prior to 1972 CO-6: 1980	Eisenmann Thermal Oxidizer
	Coater CTO-4 (Part of line PC-7) with Roll Coater in the Permanent Total Enclosure (PTE) and Drying Oven, Controlled by Individual Build-in Thermal Oxidizer	2003	Thermal Oxidizer

7.2.3 Applicable Provisions and Regulations

a. An "affected coating line" for the purpose of these unit specific conditions, is each roll coater or overvarnish

applicator with respective gas fired curing oven, permanent total enclosure (if used), and natural gas-fired thermal oxidizer.

b. Each affected coating line at the source is subject to the following:

i. Overvarnish application (Lines PC-2 and PC-5):

A. 35 IAC 218.204(b)(1)(B); or

B. 35 IAC 218.207(h)(2).

ii. Coating application (Lines CO-1, 3, 4, 6, CTO-4):

35 IAC 218.207(h)(2)

c. All these requirements and limitations are described further in Condition 7.2.6.

d. The affected coating line CO-4 and CO-1 are subject to 35 IAC 212.322(b)(1), which provides that:

> No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 1) [35 IAC 212.322(a)].

e. Each of the affected coating line (CO-3,6, CTO-4, and PC-2/PC-5) is subject to 35 IAC 212.321(b)(1), which provides that:

> No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

f. Each affected coating line is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. CAM requirements are discussed further in Condition 7.2.8 and Attachment 3.

7.2.4 Non-Applicability of Regulations of Concern

a. The affected coating line is not subject to 35 IAC Subpart G: Use of Organic Material, pursuant to 35 IAC 218.209, Exemption From General Rule on Use of Organic Material, which excludes affected coating line from this requirement.

b. The affected coating line is not subject to 40 CFR 60 Subpart WW "A Standards of Performance for the Beverage Can Surface Coating Industry", because no beverage can coating performed at this location.

c. This source is not subject to 40 CFR Part 63, Subpart KKKK, "National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans", because the source is not a major source of HAP emissions according to the limits established in Condition 5.6.2.

d. The affected coating line is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.

e. The affected coating line is not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected coating line is not by definition a fuel combustion emission unit.

7.2.5 Control Requirements and Work Practices

a. Each thermal oxidizer shall be in operation at all times that the associated emission unit(s) are in operation and emitting VOM. Each afterburner shall not be seasonally shut down as would be allowed in 35 IAC 218.107.

b. The afterburner combustion chamber of each thermal oxidizer shall be preheated to the manufacturer's recommended temperature but not lower than 1400°F, before the coating operation is begun, and this temperature shall be maintained during operation of the affected coating line.

c. The Permittee shall follow good operating practices for the thermal oxidizer, including periodic inspection, routine maintenance and repair of defects.

d. The capture systems utilized on coating lines CO-1, 3, 4, 6, and CTO-4 shall be designed, operated, and maintained to provide permanent total enclosure, in accordance with the criteria in 35 IAC 218 Appendix B, Procedure T.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected coating lines are subject to the following:

a. The affected coating lines CO-1, 3, 4, and 6 at the source are subject to limitations of 35 IAC 218.207(h)(2) for can coating, which provides that the coating line shall be equipped with a capture system and control device that provide 75 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency.

b. The affected coating lines PC-2 and PC-5 at the source are either subject to limitations of 35 IAC 218.204 (b)(1)(B) for the overvarnish can coating or 35 IAC 218.207(h)(2) for capture system and control device requirements for can coating, which provide that:

i. No owner or operator of an affected coating line shall apply at any time any overvarnish coating in which the VOM content exceeds the following emission limitations for the coating as applied to can sheets. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator:

kg/l	lb/gal
0.34	2.8

Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composites [35 IAC 218.204 (b)(1)(B)].

ii. Each affected coating line shall be equipped with a capture system and control device that provide 75 percent reduction in the overall emissions of VOM from the coating line and the control device has a 90 percent efficiency [35 IAC 218.207(h)(2)].

c. i. Emissions from the affected coating line CO-1 shall not exceed the following limits:

VOM Emissions (T/mo)	VOM Emissions (T/yr)
3.94	39.4

These limits are based on the maximum operating rate and 100% capture of VOM emissions from applied

coating, reducer, and other VOM containing materials. Compliance with annual limits shall be determined from a running total of 12 months of data.

ii. The above limitations were established in initial CAAPP Permit 95120005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

d. i. Emissions and operation of the affected coating line CO-3 shall not exceed the following limits:

Material	Usage (gal/mo)	Usage (gal/yr)	Average VOM Content (lb/gal)	VOM Emissions (T/mo)	VOM Emissions (T/yr)
Coating	6,480	77,753	4.83	0.38	4.50
Clean-up	71	852	7.125	0.25	3.03
Reducer	93	1,112	100%	0.001	0.1
			Total:	0.631	7.63

These limits are based on the maximum operating rate and overall reduction of VOM emissions 97.6% (100% capture of permanent total enclosure and 97.6% destruction efficiency of VOM which enters the oxidizer). Calculations of VOM emissions from reducer are based on the density 6.7 lb/gal and VOM content 100%.

ii. The above limitations were established in initial CAAPP Permit 95120005, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203. In addition, the above limitations contain revisions to previously issued Permit 96050088, as reflected in this initial Title V permit. Specifically, material usage limits and VOM emissions have been decreased [T1].

e. i. The thermal oxidizer controlling emissions from the coater CTO-4 (part of Line PC-7) shall be operated to achieve at least 100 percent capture and 97.5 percent overall control efficiency for VOM.

ii. Total VOM emissions from the Line PC-7 (including emissions from both coating and printing operations performed as described in Section 7.1 of this permit) shall not exceed the following limits:

VOM Emissions	
(Ton/mo)	(Ton/yr)
0.9	8.25

These limits are based on the maximum operating rate and an oxidizer overall control efficiency as described above. Compliance with annual limits shall be determined from a running total of 12 months of data.

iii. The above limitations were established in Permit 00120052, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

f. Compliance with annual limits for all affected coating lines mentioned in Condition 7.2.6 shall be determined from a running total of 12 months of data.

7.2.7 Testing Requirements

a. Upon request from the Illinois EPA or USEPA the Permittee shall conduct tests in accordance with procedures of 35 IAC 218.105(d), (e) and (f) to measure the overall control and performance of the oxidizer(s) controlling the affected coating line(s). All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing.

b. Upon request from the Illinois EPA or USEPA the VOM content of each coating applied on lines PC-2 and PC-5 shall be determined by the applicable test methods and procedures specified in 35 IAC 218.105.

c. The percent concentration of solvent in the VOM containing waste shall be determined in accordance with USEPA Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods (SW-846), Test Methods 8260, or by using USEPA Method 24 of 40 CFR 60, Appendix A.

7.2.8 Monitoring Requirements

a. Pursuant to 35 IAC 218.105(d)(2)(A)(i), each thermal oxidizer shall be equipped with a USEPA approved continuous monitoring device which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. This monitoring equipment shall monitor the combustion chamber temperature of each afterburner

c. Compliance Assurance Monitoring (CAM) Requirements

Each affected coating line is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The Permittee shall comply with the monitoring requirements of the Compliance Assurance Monitoring (CAM) Plan described in Attachment 3 pursuant to 40 CFR Part 64 as submitted in the Permittee's CAM plan application. The Permittee shall maintain records of the monitoring data, monitor performance data, corrective actions taken, monitoring equipment maintenance, and other supporting information, as required by 40 CFR 64.9(b)(1).

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected drum cleaning furnace to demonstrate compliance with Conditions 5.6, 7.2.3, and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

a. Pursuant to 35 IAC 218.211(e)(2), the Permittee shall collect and record all of the following information each day for each affected coating line and maintain the information at the source for a period of three years:

i. Control device monitoring data;

ii. A log of operating time for the capture system, afterburner, monitoring equipment and the associated coating line; and

iii. A maintenance log for the capture system, thermal oxidizer and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

b. The following records are required to demonstrate compliance with Conditions 5.6 and 7.2.6:

i. The name and identification number of each coating, overvarnish and clean-up solvent as applied on each affected coating line;

ii. The usage of each coating and overvarnish, in units of gallons/month and gallons/year;

iii. The average weight of VOM per volume of each coating and overvarnish (minus water and any compounds which are specifically exempted from the definition of VOM), as applied each month on the affected coating line;

iv. The average density of each applied coating, overvarnish and cleanup solvent, in units lb/gal;

v. The usage of clean-up solvent, in units of gallons/month and gallons/year;

vi. The average weight of VOM per volume of each cleanup solvent, in units lb/gallon, as applied each month on the affected coating line;

vii. Records of natural gas usage, in units scf/month and scf/year;

viii. Coating, varnish and clean-up usage on the coating line CO-3, in units of gal/month and gal/yr;

ix. VOM emissions from each coating CO-1, CO-3, CTO-4 and calculated based on the recordkeeping requirements and compliance procedures from Condition 7.2.12; and

x. Total VOM and NO_x emissions in tons/month and tons/year from all affected coating lines calculated based on the recordkeeping requirements and compliance procedures from Condition 7.2.12.

c. VOM containing waste emission reduction:

i. VOM containing waste collected (T/mo and T/yr).

ii. The average VOM content (wt. %) of the VOM containing waste collected, as determined in accordance with Condition 7.2.7.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coating lines with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The Illinois EPA shall be notified when:

a. Emissions of VOM from the affected coating lines in excess of the limits specified in Conditions 5.6 and 7.2.6 based on the current month=s records plus the preceding 11 months within 30 days of such an occurrence.

b. Pursuant to 35 IAC 218.211(e)(3), the Permittee shall notify the Illinois EPA in the following instances:

i. Any record showing violation of 35 IAC 218.207 within 30 days of such an occurrence.

ii. At least 30 calendar days before changing the method of compliance from 35 IAC 218.207 to 35 IAC 218.204 or 205, the Permittee shall comply with all requirements of 35 IAC 218.211(c)(1) and (d)(1).

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Change in the coatings, overvarnish and cleanup solvents used, provided the affected coating lines continue to comply with the Condition 7.2.6 of this permit.

7.2.12 Compliance Procedures

a. Compliance with Condition 7.2.5 is addressed by the monitoring requirements in Condition 7.2.8 and the records required in Condition 7.2.9.

b. Compliance of the affected coating lines PC-2 and PC-5 with VOM emission limitations in Condition 7.2.6(b)(i) shall be based on the recordkeeping requirements in Condition 7.2.9 and by the use of either testing or by use of the formula listed below:

$$\text{VOM Coating Content} = V \times D/[1 - W \times D]$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \sum (w_i/d_i),$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal

and the summation $\sum$ is applied over water and all exempt compounds i in the coating.

c. Compliance of all affected coating lines with emission limitations in Conditions 5.6.1 and 7.2.6 shall be based on the recordkeeping requirements in Condition 7.2.9 and by use of the formula listed below:

i. Emissions from Coating Operation (EI) = [Actual Coating Usage (gal/mo) x Coating Density (lb/gal) x VOM Content of the Coating (wt. %)] x [Capture Efficiency (100-capture efficiency,%)/100 x Destruction Efficiency (100-destruction efficiency,%)/100] - [VOM Containing Waste (gal/mo) x

Waste Density (lb/gal) x VOM Content in Waste (wt. %)];

ii. Emissions from Cleanup Operation (EII) = (Actual Clean-up Solvent Usage (gal/mo) x Average Solvent Density (lb/gal) x VOM Content of the Clean-up Solvent (wt. %) - [VOM Containing Waste (gal/mo) x Waste Density (lb/gal) x VOM Content in Waste (wt. %)];

iii. Total VOM Emissions = EI + EII

d. Emissions of NO_x, CO, PM and VOM from ovens and oxidizers burning natural gas shall be calculated based on the standard emission factors for natural gas combustion from AP-42:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March, 1998.

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

7.3 Space Heater

7.3.1 Description

Natural gas-fired space heaters are used to produce comfort heating at this source.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
Space Heater	Natural Gas-Fired Space Heater with a Maximum Heating Capacity 25.0 mmBtu/hr	1987	None

7.3.3 Applicable Provisions and Regulations

a. An "affected space heater" for the purpose of these unit specific conditions is a natural gas-fired heater which is used to produce comfort heating at the source.

b. No person shall cause or allow the emissions of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air [35 IAC 216.121].

7.3.4 Non-Applicability of Regulations of Concern

a. Affected space heater is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of each heater is less than 73.2 MW (250 mmBtu/hr).

b. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

c. The affected space heater not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected space heater does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Control Requirements and Work Practices

Control requirements are not set for the affected space heater. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.3.6 Production and Emission Limitations

Production and emission limitations are not set for the affected space heater. However, there are general source-wide production and emission limitations set forth in Condition 5.6.

7.3.7 Testing Requirements

Testing requirements are not set for the affected space heater. However, there are may be provisions for source-wide testing requirements set forth in Condition 5.7 and general testing requirements set forth in Condition 8.5.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected space heaters. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected space heater to demonstrate compliance with Condition 5.6, pursuant to Section 39.5(7)(b) of the Act:

a. Natural gas usage, in terms of scf/month and scf/year.

b. Emissions of regulated air pollutants (tons/month and tons/year) calculated based on the recordkeeping requirements and compliance procedures from Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected space heater with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected space heater. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.3.12 Compliance Procedures

Compliance with the emission limits established in Condition 5.6 of this permit shall be based on the recordkeeping requirements

in Condition 7.3.9 and the emission factors and formulas listed below:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March, 1998.

Heater Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after May 25, 2005, unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Obligation to Comply with Title I Requirements

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment),

practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the

certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed

description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal

application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

b. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

i. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A\ (P)^{B}$$

Where:

P = Process weight rate

E = Allowable emission rate

ii. For process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

iii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

d. Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

e. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

f. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A\ (P)^{B}$$

Where:

P = Process weight rate

E = Allowable emission rate

i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

g. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

Table 3.1 – PSEU Designation:	Four Thermal Oxidizers for coating/printing
Significant Emission Unit Section:	7.1; 7.2
Pollutant:	VOM, HAP

Indicators:	#1: Afterburner Chamber Temperature

GENERAL CRITERIA

THE MONITORING APPROACH USED TO MEASURE THE INDICATORS:	A temperature monitoring devices is used to control the temperature in the thermal oxidizers to ensure operation at the maximum destruction efficiency
THE INDICATOR RANGE WHICH PROVIDES A REASONABLE ASSURANCE OF COMPLIANCE:	Maintain a minimum of 1400°F when the incinerators are in operation
QUALITY IMPROVEMENT PLAN (QIP) THRESHOLD LEVELS:	The combustion chamber temperature shall be maintained in the range of 1400°F and 1550°F

PERFORMANCE CRITERIA

THE SPECIFICATIONS FOR OBTAINING REPRESENTATIVE DATA:	A thermocouple
VERIFICATION PROCEDURES TO CONFIRM THE OPERATIONAL STATUS OF THE MONITORING:	Operation and response of chart recorder Review of periodic records
QUALITY ASSURANCE AND QUALITY CONTROL (QA/QC) PRACTICES THAT ENSURE THE VALIDITY OF THE DATA:	The Combustion chamber temperature is monitored a chart recorder and a thermocouple sensor set at 1425°F and automatically recorded on or above the set point
THE MONITORING FREQUENCY:	Continuous during operation
THE DATA COLLECTION PROCEDURES THAT WILL BE USED:	Chart recorder on a per shift basis to ensure continuity. The sensor is changed annually
THE DATA AVERAGING PERIOD FOR DETERMINING WHETHER AN EXCURSION OR EXCEEDANCE HAS OCCURRED:	N/A

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

AB:psj